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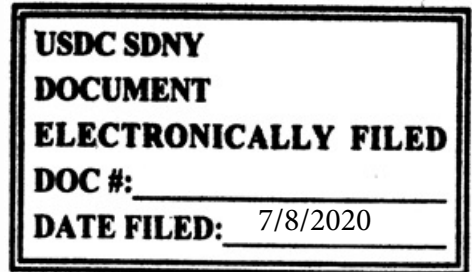
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MICHAEL SAMUEL
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July 8, 2020

ADMITTED IN NY

Judge Stewart Aaron
United States District Court – Southern District
500 Pearl Street
New York, NY 10007



Re: *Teofilo Humberto Candelario vs. John Doe*
Case No.19cv7732 (pae)(sda)

Dear Judge Stewart Aaron:

Please be advised that we represent the plaintiff in the above entitled matter. Discovery is scheduled to close on Friday, July 10, 2020 however the parties have not yet been deposed. The Plaintiff was scheduled to be deposed tomorrow, however we have just been informed that he is undergoing chemotherapy today and therefore is unable to travel to or appear in person at the deposition due to his immunocompromised condition. We have requested that the deposition be conducted via Zoom but we have been advised by Mr. Hamra that they need more than 24 hours notice to set that up. We would respectfully request a final 3 week extension of time so that we can schedule the depositions. We have agreed to cover the cost of any cancellation fee incurred by Mr. Hamra. Mr. Hamra does not object to this request.

We thank the Court for its attention to this matter and are available at Your Honor's convenience should the Court have any questions regarding the foregoing.

Respectfully submitted,

/s/ Michael Samuel
Michael Samuel, Esq.

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Request GRANTED IN PART. Good cause has been shown for extension of the deadline to take the deposition of Plaintiff and the Court hereby grants an extension until 7/31/2020 to take the Plaintiff's deposition. The Court DENIES WITHOUT PREJUDICE the request insofar as it seeks to extend the deadline for any additional depositions. If an extension to take other depositions is sought, the parties shall provide the names of any other deponents and good cause why their depositions could not be taken within the prescribed, already-extended deadline. SO ORDERED.

Dated: 7/8/2020

Att C an